

Charlotte Grezo
Director of Corporate Responsibility



12 May 2006

Dennis Johnson
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Dear Mr Johnson

I am the Director of Corporate Responsibility for Vodafone Group Plc. Arun Sarin has asked me to respond to your letter to him dated April 13, 2006, enquiring whether Vodafone does business in Sudan. In response to your letter we have conducted a review of our operations, and we can assure you that neither Vodafone Group Plc, nor any company in which Vodafone Group Plc holds an interest, has any business operations in Sudan, owns any property in Sudan or engages in any business with the government of Sudan.

Vodafone's contact with Sudan is limited to wholesale roaming and interconnect arrangements that certain Vodafone subsidiaries and joint ventures have with mobile and fixed line operators in Sudan. These arrangements are a standard practice of a global telecommunications service and provide our customers with the ability to make and receive calls in or to over 190 countries including, in the case of certain of our operating companies, Sudan. Vodafone does not, however, directly or indirectly, have any subsidiaries, other equity investments, assets, facilities or employees located in Sudan and Vodafone has made no capital investment, directly or indirectly, in Sudan. Vodafone does not export products or technology to, or itself provide services within, Sudan. The turnover and costs related to the roaming and interconnect arrangements are immaterial to Vodafone's business.

With respect to your specific questions set forth in your letter we provide the following answers:

- 1 Neither Vodafone, any subsidiary of Vodafone, nor any joint venture thereof ("Affiliated Business Entity") engages in any direct or indirect business activity in Sudan. Given the limited nature of the contacts between Vodafone or its Affiliated Business Entities and Sudan, we do not believe that Vodafone's activities constitute doing business in or having business operations in Sudan as those terms are defined in your states' laws or proposed laws relating to divestment from Sudan.
- 2 As stated above neither Vodafone nor any of its Affiliated Business Entities has business operations in or is doing business in Sudan. The amount of the revenue received by Vodafone and its Affiliated Business Entities from the roaming and interconnect agreement is immaterial to Vodafone's business.

Vodafone Group Services Limited

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- 3 Neither Vodafone nor any Affiliated Business Entity has made any capital investment in Sudan.
- 4 Neither Vodafone nor any Affiliated Business Entity has entered into any licensing agreement with the Sudan government in order to engage in current or future business activities.
- 5 To the best of our knowledge, neither Vodafone nor any Affiliated Business Entity is doing any business with a corporation that is owned by the Sudan government.
- 6 To the best of our knowledge neither Vodafone nor any Affiliated Business Entity has any employees based in Sudan.
- 7 To the best of our knowledge neither Vodafone nor any Affiliated Business Entity pays any fees and or taxes to the Sudan government.
- 8 Vodafone has not adopted or implemented policies or procedures specifically for operating in Sudan, as Vodafone does not operate in Sudan.
- 9 As neither Vodafone nor any Affiliated Business Entity has any business operations or does business in Sudan, we have no specific programmes with respect to human rights in Sudan.

I hope the above is satisfactory. Please contact me if you have any questions.

Best regards

CAB Grezo

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cc

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